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IACA INTERNATIONAL ANTI-CORRUPTION ACADEMY

REGIONAL

ALUMNI CONFERENCE ASIA

2022

Reflections and new perspectives for anti-corruption and compliance: A showcase of IACA alumni projects and Collective Action initiatives

POST CONFERENCE PUBLICATION

Empowering Professionals

FOREWORD

It is our pleasure to present the Regional Alumni Asia 2022 Post Conference Publication with the theme - Reflections and New Perspectives for Anti-Corruption and Compliance: A showcase of IACA Alumni Projects and Collective Action Initiatives.

This publication presents a summary of the presentations from the alumni speakers at the regional conference as well as some others from the region who could not participate but wanted to share their perspectives. It showcases initiatives and projects in the region established by IACA Alumni and those that they are involved in.

The Regional Alumni Conference Asia was held in Kuala Lumpur, Malaysia from 21 to 25 November 2022. The conference brought together 11 conference speakers, lecturers, and facilitators from across the globe and 35 IACA alumni from East, South-East and South Asia, representing 10 countries namely Bangladesh, Republic of Korea, Hong Kong, India, Indonesia, Malaysia, Mongolia, Nepal, Pakistan, and the Philippines.

The IACA Alumni Network has over 5.100 members from 168 countries and jurisdictions around the world. It is comprised of former students and participants who have successfully completed IACA training activities and/or graduated from its master's programmes.

The Regional Alumni Conference Asia was fully funded by the Siemens Integrity Initiative under the Golden Stretch Funding Round. The conference acknowledges the growth and impact of the IACA alumni network globally and regionally.

Furthermore, the conference highlights the need to enhance networking and to harness and showcase the implementation of Collective Action initiatives by IACA alumni.

Despite attendance being negatively impacted by the global COVID-19 pandemic, the conference presented a good opportunity for the alumni to connect, reinspire one another, and strengthen their existing efforts and initiatives.

As was noted during the conference, IACA alumni in Asia are engaged in many activities and initiatives that are at various stages of implementation and growth.

The initiatives and activities presented in this publication include:

- Supporting Anti-Corruption Defenders in Indonesia;
- Promotion Of Transparency in Local Administration In Lunglei District, India;
- Fighting corruption in India using the Right to Information Framework;
- An Assessment Survey Project on the Resolution of Corruption Cases in Mongolia;
- GLASTIDE Project on Addressing Corruption and Data Opacity in Pakistan;
- The Anti-Corruption Collective Action Working Group Formed by UN Global Compact Network India (UNGCNI).

In addition, the publication presents some tips and insights on establishing, implementing and sustaining Collective Action initiatives extracted from the Collective Action Lab sessions during the conference.

This publication would not be possible without the consolidated efforts of many. We would like to extend our gratitude to all IACA alumni from the Asia region. We are particularly grateful to the alumni contributors who not only authored papers and presented at the conference but also diligently reviewed and edited their papers for final publication.

Also, we would like to extend a special thank you to Mr. Sven Biermann and Mr. Martin Zapata who held a lab session especially focused on Collective Action and provided the alumni with valuable insights and feedback on their initiatives.

We would like to express our sincere appreciation to the Siemens Integrity Initiative for supporting the Regional Alumni Conference activities including this publication. Lastly, we would like to thank all our IACA Alumni across the globe for their enduring support and for leading from the front and being glorious ambassadors of IACA in the fight against corruption. We hope that all of you, alumni and all other readers alike, will return for future conferences and issues of the alumni publications.

Regional Alumni Conference Team 2022
Alumni Conference Asia Post Conference Publication

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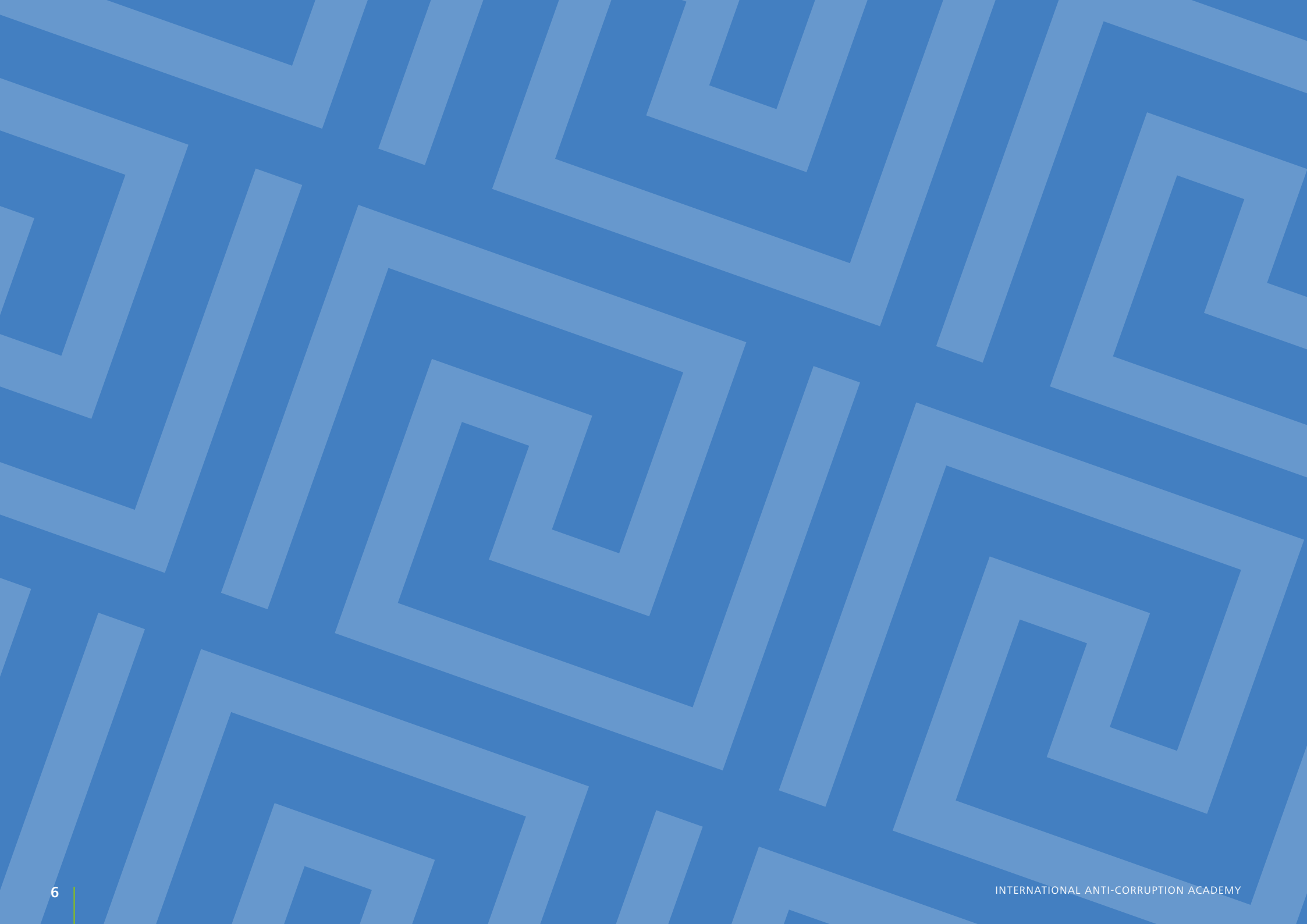

The following are some of the selected activities, projects and initiatives established by IACA alumni and/or the activities that the alumni are involved in.

The projects and initiatives presented below are not of IACA and the opinions expressed in this publication are those of the authors. They do not purport to reflect the opinions or views of the IACA or its staff. The publication of the initiatives does not imply the expression of any opinion whatsoever on the part of IACA concerning the anti-corruption status and efforts of any country, area or territory or of its authorities.

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Collective Action principles

Successful Collective Action Initiatives bring stakeholders together, addressing their interests as individuals and institutions leading to high acceptance levels. The acceptance level needs to be constantly monitored.

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Indonesia Memanggil (IM) 57+ Institute

Prepared and brought to you by:

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IACA Alumni Status:
IACA Summer Academy 2021 alumnus

Website: **im57.org**

WWW.IACA.INT

About the initiative

The "IM57+ Institute" is an anti-corruption initiative that was established on 30 September 2021 by 58 former employees of the Indonesia Corruption Eradication Commission (KPK) who on their last day were unfairly dismissed, according to the findings of the Ombudsman of the Republic of Indonesia and the National Human Rights Commission of the Republic of Indonesia.

The IM57+ Institute was officially incorporated as an association based in Jakarta in accordance with the Decree of the Minister of Law and Human Rights on January 5, 2022.

The Institute provides citizens with an alternative platform to fight against corruption in both the private and public sector. It also serves as a support network for anti-corruption defenders in the country. The IM57+ Institute implements 4 main programmes: Education-Socialisation, Research, Independent Investigation, and Advocacy aimed at enhancing the fight against corruption. It works in coalition with other civil society entities such as non-governmental organizations, students, workers, and journalists.

Problem being addressed

Anti-corruption defenders, in every region of the world, are targets of arbitrary arrest and detention, death threats, harassment and defamation, restrictions of their freedoms and acts of intimidation and reprisals and unfair dismissals at work. Likewise in Indonesia, anti-corruption activists have long experienced terror such as death threats, bomb threats, acid attacks, including specifically the dismissal of 58 KPK's employees who were handling strategic corruption cases.

Since the dismissal of the 58 KPK's employees in 2021, there has been a negative impact on the anti-corruption activities of Indonesia. One of the most recent examples being that Indonesia fell 14 ranks to 110th (out of 180 countries) in the Transparency International Corruption Perception Index (2022). The CPI score fell from 38 in 2021 to 34 in 2022, which is the worst since 2014. The decline in the CPI score was also followed by a significant decrease in the Political Risk Services (PRS) International Country Risk Guide of PERC Asia, and other sub-components which reflected the decline in corruption eradication performance in almost all aspects, including competitiveness which is always touted in the investment sector.

If this condition is left unchecked, there will be a significant impact on other sectors due to the fact that anti-corruption is an enabling factor for the protection of human rights, healthy economy, environmental protection, and sustainability.

Another area of concern is that there is more and clear evidence that the government of Indonesia has continued to ignore the rule of law and principles of democracy and efforts to eradicate corruption.

Objectives, and strategy

The IM57+ Institute was established to organize and consolidate all anti-corruption movements by involving public and civil society organizations to oversee and externally supervise corruption eradication efforts made by the government, and to advocate against any effort to retaliate and punish anti-corruption defenders. Having experienced threats and unlawful dismissal themselves the IM57+ members realize that there is a need to provide a support network for anti-corruption defenders to ensure their voices are not silenced.

To fight corruption, the IM57+ Institute follows the collective action approach, and works with several stakeholders including Non-Governmental Organizations (NGOs), civil society coalitions, the media, universities, and the public. It values national and international cooperation to advance the anti-corruption agenda.

Activities and results

IM57+ Institute has 4 main programmes listed as follows:

1. Independent Investigations of corruption cases/ other human rights violation cases based on the public interests.

2. Education-Socialisation of anti-corruption for different stakeholders, mainly targeting students and the public at large and conducting education and training to increase public awareness regarding the issue of corruption and money laundering.

3. Research on corruption related issues and studying effective methods for corruption detection and prevention.

4. Advocating for public policies taken by the government for potential conflict with anti-corruption values and public interests, as well as advocating against any terror attack faced by anti-corruption and/or human right defenders.

To date, IM57+ have achieved quite significant accomplishments. First, the Institute has conducted at least 11 independent investigations related to corruption.

The institute has also conducted eight education-socialisation activities through public discussions on current corruption issues such as: the future of law enforcement in Indonesia, risk in unpacking oligarchy, conflict of interest of public officials, among others.

Thirdly, the institute has conducted three research activities on a corruption case involving Covid-19 social assistance, corruption-related regulatory improvement, as well as Law and Institutional Reforms. The institute has advocated through the court on the unlawful dismissal of 58 KPK employees and against the criminalization of anti-corruption activists in Indonesia (e.g., Haris-Fatia and Nurhayati). The institute has also successfully published a book on the stories of 58 KPK employees who were unlawfully dismissed, titled “Perlawanan Sehormat-hormatnya”.

Challenges

Running the IM57+ Institute has not always been smooth. The IM57+ Institute faces many challenges. An example is that it is framed and perceived as a "radical" entity by some authorities. Another challenge that IM57+ Institute faces is funding. Due to the nature of the institution, the IM57+ Institute is very selective in its sources of funding to ensure there is no potential conflict of interests in the future. However, this unfortunately limits its funding which risks the sustainability of the organization. Lastly, in terms of membership, the IM57+ Institute started with membership exclusively for the 58 KPK employees who were dismissed. However, with multiple programs planned, IM57+ Institute is in need of volunteers and/or new members that will be able to support the daily activities of the organization.

Lessons learnt

Many lessons have been learnt including that anti-corruption activities are not without risks, especially when corruption has been embedded in the culture for decades warranting the need to proceed cautiously to ensure the cause is worth fighting for.

Another lesson is that the power of the people /citizens does exist; hence the IM57+ are working in partnership with the civil society coalition to fight corruption. Also, the combined forces of civil society coalition, NGOs, and the citizens supported by a solid platform are needed to independently oversee government activities and policies to minimize corruption. Lastly, the initiative is proof that being dismissed from the KPK is not the end of the world. After KPK, a majority of the IM57+ Institute's members have successfully built their careers, some have established law and investigation firms, joined private companies and others are members of the national police among others.

Additional resources

Website of the Institute: https://im57.org

Book publication on the stories of the 58 employees of KPK employees who were unlawfully dismissed. The book title is "Perlawanan Sehormat- Hormatnya".

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Collective Action principles

Individual interests in a Collective Action may differ from institutional interests. However these interests may be aligned if proper incentives are in place.

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Promotion of Transparency in Local Administration Initiative in Lunglei District

Prepared and brought to you by:

JAMES MIAHLUNG

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IACA Alumni Status:

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Special Anti-Corruption training at IACA 2019 alumnus

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Executive summary

In the Indian administrative system, Gram Panchayat also known as Local Councils or Village Councils (VC) in the northeastern part of the country remain the primary unit of implementation of various developmental programmes at the local/village level. Every year both the central government and State (regional) governments transfer a huge amount of money to VCs to implement rural development programmes— notable among them is the 15th Finance Commission (FC) grant and Mahatma Gandhi National Rural Employment Guarantee Schemes (MGNREGS).

Village Councils in the Mizoram region are always vulnerable to corruption risks. With the obligation to serve their constituency, many VC members often indulged in unfair favoritism in selection of beneficiaries for government schemes and have tried to gain undue advantage while executing developmental works. As a result, village community members often viewed VCs as an institution marred by corruption and unethical practices.

The Local Level Integrity Perception Survey conducted by the District Local Administration Officer (DLAO) Lunglei office in February 2020 affirmed this negative could be corruption free while 73% of respondent opined that their VCs did not perform their role in a transparent manner.

In light of the above administrative environment, DLAO Lunglei office tried to promote a culture of transparency in the functioning of 15 Village Councils in Lunglei district headquarters out of the 113 VCs in the district through simple and easy to implement activities including open disclosure of financial statement (receipt of funds as well as expenditures) before Special Gram Sabha (Village assembly) and dissemination of financial information through social media platforms (community information sharing group).

The initiative was implemented in Lunglei district headquarters area in Mizoram state, India by DLAO office Lunglei under Local Administration Department (LAD), government of Mizoram. The initiative pertains to the local governance sector.

Problem being addressed

Through the initiative, corruption or integrity problems prevalent in local governance such as- improper utilization of funds, lack of trust toward VC, favoritism along political lines, etc. were sought to be addressed. The stakeholders of the initiative included Members of Village Councils (both executive body and other members), officials from LAD and the Rural development department, civil society groups and the media.

Objectives and activities, methods and/or tools applied

The initiative tried to achieve the following objectives:

a. Promotion of financial transparency (open disclosure of financial statements) to develop trust between VCs and community members.

b. To bring a sense of ownership among community members.

In order to achieve the above stated goals, the following activities were carried out by VCs:

a. Regular convening of meeting of village councils with the participation of all members and disclosure of detailed financial statements of the VC in meetings,

b. Convening of the village assembly or special Gram Sabhah at least once a month and disclosure of financial statements of the VC to the assembly,

c. Display of financial statements at the VC office,

d. Disclosure of financial statements through local social media groups/VC information group and community-based newspaper.

e. Disclosure of helpline number where community members can submit complaints.

f. Regular joint inspection of development works executed by the VC with civil society groups.

The DLAO office had regular communication with the President of Village Councils to implement the project effectively and reports on activities were regularly shared by respective VCs. A Project Monitoring Committee comprising officials from both LAD and the Rural Development (RD) department was also occasionally convened to promote inter-departmental coordination. Officials from the two departments used to participate in the special Gram Sabha to motivate VCs and community members.

In order to recognize VCs who have made exemplary efforts in implementation of activities under the project, a Transparency Award was also distributed. This served to encourage and motivate award recipients and others to spread the message of transparency among the Village Councils.

Results/impact/what has changed

After implementation of the initiative, a change in public perception towards VCs was noticed which was reflected in the results of a post implementation survey wherein 54% of respondents opined that VCs have performed their role in a transparent manner. Similarly, 48% of respondents also believed that members of VCs could be free from corruption. Increase in the level of trust between VCs and community members and greater sense of ownership was also noticed.

Final remarks (policy implications, lessons learned, replicability, etc.)

Positive outcomes of the initiative show the following policy implications:

a. Need for strengthening the transparency mechanism in implementation of developmental schemes by Village Councils and urban local bodies.

b. Need for code of ethics for members of local bodies supported by strong legislative backup.

Additional resources

Link/publication relating to the initiative:

1. https://dipr.mizoram.gov.in/post/promotion-of-transparency-in-local-administration-phase-ii-2021-concludes-at-lunglei
2. https://dipr.mizoram.gov.in/post/lunglei-bawrhsap-in-promotion-of-transparency-in-local-administration-hmalakna-a-tlangzarh
3. https://dipr.mizoram.gov.in/post/local-level-integrity-perception-survey-2020-result-tlangzarhna-lungleiah-neih-a-ni

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It is important to use different incentives for each type of stakeholder and to make a specific business case for each.

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Right to Information Framework as an Anticorruption Tool: Combating Pseudo-Compliance

Prepared and brought to you by:

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IACA Alumni Status:
Regional Summer Academy South and East Asia 2019

Website: Collective Action Webpage - http://getup4change.org/rti/

WWW.IACA.INT

About the initiative

This Collective Action initiative is being implemented in India, focusing on the efficacy of the Right to Information Act 2005 (RTI) as an anti-corruption tool. The pilot project focused on ten federally funded institutions and their compliance with RTI laws. The principal area of the initiative is compliance standards and corruption prevention.

Problem being addressed

Good governance requires transparency, accountability, the rule of law, compliance, and public engagement. Globally, RTI activists face severe personal threat in sensitive cases. The Commonwealth Human Rights Initiatives reported that there were 465 attacks on RTI activists in the year 2021 alone (Ansari, 2022). Experiences from the largest democracy in the world, India, have shown that there is always a gap between the enacted laws and their compliance. In 2021, the Corruption Perceptions Index of Transparency International ranked the country in 85th place out of 180 on a scale where, the lowest-ranked countries are perceived to have the most honest public sector.

In 2005 India adopted the Right to Information Act (RTI), which was expected to act as a powerful tool in the battle against corruption, arbitrariness, and power abuse. Though broadly speaking, the RTI has helped good governance at various levels, the initiative investigated its journey in compliance and anti-corruption more than fifteen years after its adoption. The results produced several startling revelations. While compliance has increased, there appears to be a refinement in subverting the RTI laws to hide corruption in 'innovative' ways in public transactions.

Objectives and strategy

The major objectives of the project are to study the efficacy of Right to Information Laws as an anti-corruption tool and to identify 'pseudo-compliance' tactics in implementing the laws.

In addition, the project set out to develop a collaborative initiative between citizens, media, and other stakeholders for using the right to information laws to reduce corruption. The project was implemented through a participatory approach where citizens and media persons use the RTI queries to unearth government activities and spending irregularities. It tested the analysis of the RTI replies that the Public Information Officers gave and cross-checked them with other sources of information. The findings brought forward, several myth-breaking highlights such as the cliché that knowledge is power, must be seen in a new light with the qualifier that 'relevant' knowledge is power. Laws are broadly followed in more technology-based information platforms but will not deliver results automatically. Information is a critical first step in tackling corruption, and the mere technical compliance of RTI laws doesn't necessarily tackle corruption on the ground. Rather, diversionary tactics are used to avoid giving out the correct information. The citizens-media coalition is found to be an operational model of anti-corruption collaboration to prevent the loopholes in the statutory provisions of the right to information. The countercheck (like fact-check on social media) by citizens and the media persons opened a multi-level communication channel that also served as a critical component of public policy efficacy and efficiency.

Activities and results

The initiative developed a network of media practitioners, academic researchers and NGO representatives and through enhanced policy implementation, monitoring and evaluation tasks by the academia it provided more visibility on corruption challenges. The initiative has also increased readership, response and follow-up action by government. It has also managed to increase awareness and build capacities in identifying pseudo-compliances, enhancing effective Right to Information Applications and collection of multi-source information.

Challenges

- Operational: Different work norms, standard operating procedures (SOPs).
- Technical: Validity and reliability of data – different standards.
- Personnel: Attrition, changing "actors"

Main takeaways

Citizens from around the globe need to become more conscious that more transparency-related laws are not simply a tool for cleaning up governments but also a critical component of public policy efficacy and efficiency. The initiative to combat pseudo-compliance in governance will shed unique insight into the intersection of laws, compliance and corruption that can afflict any administrative structure. In addition, it will help to understand how the Right to Information as an instrument is used and misused on the ground.

Additional resources

Collective Action Webpage - http://getup4change.org/rti/

Reference

Ansari, M. (2022, Jan 9). India: The unchecked attacks on RTI activists reveal India's democracy's decline. Europe Solidaire Sans Frontières. http://europe-solidaire.org/spip.php?article60818

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Collective Action principles

Collective Action initiatives require stable and sustainable administrative and operational support to be successful.

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Diagnostic Assessment of the Resolution of Corruption Cases in Mongolia

Prepared and brought to you by:

TUMURBAATAR DOLJINSUREN

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An energetic young professional in the development sector. Earned 8+ years of progressive experience in local and international NGOs as a researcher, project officer, coordinator, and project manager. Highly interested and has experience with research and M&E of good governance area. Notably, a field in anti-corruption, transparency in the public sector, and quality and livelihood of policy. Currently, Ms. Tumurbaatar is co-managing the "Building Capacity to Counter Illegal Mining in Mongolia" at the Asia Foundation as a Project Coordinator for Good Governance. Also, she has a thriving, and innovative experience with ISO Management System Standards implementation through consultancy service projects.

IACA Alumni Status:
Regional Summer Academy South and East Asia 2019 alumna

Website: https://www.adb.org/sites/default/files/project-documents/52197/52197-001-tar-en.pdf

WWW.IACA.INT

About the initiative

The comprehensive diagnostic assessment on reporting, investigation, prosecution and adjudication of corruption cases was conducted within the "Strengthening the Anticorruption Regime" project, implemented jointly by the Independent Agency Against Corruption (IAAC), General Prosecutor's Office (GPO) and Judicial General Council (JGC), with financing from the Asian Development Bank (ADB). A team from the Asia Foundation (TAF) was selected through a competitive procurement to lead on data collection and analysis.

Problem being addressed

The assessment was designed to respond to growing public pressure for meaningful action on corruption and increasing recognition of the problem at the political level. It sought to provide evidence-based recommendations for policymakers and officials for remedial actions for enhancing effective investigation, prosecution, and adjudication and its legislative changes in the legal framework.

Objectives and strategy

After completing the assessment, the main project has implemented activities to reach the following outcomes: enhance the capacity of investigators in IAAC, the prosecutors in the GPO, and judges in the judiciary to make changes to corruption-related reporting mechanisms, guidelines, laws, and regulations recommended.

The recommendations provided by the diagnostic assessment has been structured around five main areas below (in total the assessment team has developed 114 specific recommendations based on the research conducted. Listed below are some of the actionable recommendations):

Activities and results

After completing the assessment, the main project implemented activities to reach the following outcomes: enhance the capacity of investigators in the IAAC, prosecutors in the GPO, and judges in the judiciary to make changes to corruption-related reporting mechanisms, guidelines, laws, and regulations recommended.

The recommendations provided by the diagnostic assessment have been structured around five main areas below (in total the assessment team has developed 114 specific recommendations based on the research conducted. Listed below are some of the actionable recommendations):

Individual Capacities

Continued investment in the individual capacity of investigators, prosecutors, and judges working on corruption cases is needed, both through training and specialization. There is also an urgent need to address issues of high workloads that are causing delays in the investigation and prosecution of corruption cases by implementing the following recommendations:

- Reducing the number of crime reports and cases per investigator and prosecutor for improved quality of investigation and case handling.
- Appointing a panel of specialized/trained judges to adjudicate corruption cases;
- Amending the Criminal Procedure Code to allow Appellate Courts to try corruption cases at the first instance.

Activities and results

Legal Framework

As currently written, the Criminal Code and Criminal Procedure Code (as well as some other relevant laws) enumerate and codify corruption crimes and identify the criminal elements that define corrupt acts in ways that legal professionals are finding difficult to understand and apply consistently.

This has led to a need for complicated procedures and additional explanations, as well as producing inconsistent interpretations as cases move through the justice system. For example, there are delays and misunderstandings being caused by uncertainty about evidentiary requirements. In addition, certain procedural requirements limit the ability of investigators and prosecutors to conclude cases successfully. The main legal issues identified are: 1) Issues with the definition of corruption crimes in the Criminal Code, 2) the statute of limitation to expire (even while inquiries are in progress) 3) Criminal sanction, current sentencing practices might be viewed as inadequate to generate an effective deterrent. Listed here are some of the recommendations to amend the Criminal code, the Criminal procedural code as well as Anti-corruption law of Mongolia:

- All inquiries and criminal investigations, before they are closed, should be subject to an independent review mechanism, such as a Review Committee formed within the structure of the agencies. Changes to the Anticorruption law and Criminal Procedure Code are required to create such a mechanism.
- Include a provision in the Criminal Procedure Code that a panel of judges should adjudicate sophisticated cases committed by highly influential public officials and involving multiple parties.
- Amend the Criminal Code to set forth clear grounds and conditions for the use of fines and imprisonment as punishment in corruption cases that are linked to the severity of the crime.
- Amend the Criminal Code to set the statute of limitation for corruption cases at no less than eight years.
- Update and expand the list of public officials identified in Article 4.1 of the Anti-Corruption Law. Specifically, add to public service officials authorized to make expert conclusions and opinions within the scope of qualification and special knowledge; members and chairs of committees mandated to make collective decisions etc.

Activities and results

Tactics and Strategy

Investigations are observed to be highly dependent on testimony, and the investigation of cases within a limited scope as stated in the reports, and not consistently checking/examining important circumstances around the case. These practices suggest areas for improvement related to investigative technique and overall strategy such as:

- Introducing and implementing investigative techniques, tactics, and management that will allow more detection and evidence gathering while corruption crimes are being planned and committed, rather than only launching investigations after crimes have been committed and reported.
- Developing clear procedures and guidance for case investigation that covers strategies for investigation based on the type of case, the status of the accused, the agency being scrutinized etc. Details should include appropriate types of operations, the appropriate sequence for a full investigation, and guidelines on when to take testimony.

Institutional Capacity and Collaboration

The assessment found some inconsistencies in definitions and approaches, poor understanding of tactics and decisions being applied, and some conflicting data and information across the participating agencies. Systems for investigators, prosecutors, and judges to learn from each other, share knowledge and information, and standardize certain definitions and understandings are all needed. In that regard implementing the following recommendations would enhance capacity and collaboration:

- IAAC, GPO and JGC should jointly develop a standard guideline/handbook explaining the elements of 11 types of corruption crimes for investigators, prosecutors and judges.
- Developing a list of standard evidence used in corruption cases, describing its types and characteristics that is accepted by the IAAC, GPO and JGC, and integrated into training and orientations for relevant investigators, prosecutors and judges.
- IAAC and GPO should jointly develop guidelines for collecting and documenting each type of evidence and procedures for checking and verifying the authenticity, and evaluation of evidence. For example, the rules for using audio and video evidence in criminal cases and court proceedings can be detailed.

Activities and results

Eliminating external influence

The assessment revealed that most respondents experience some sort of external influence. It was common that persons with a direct or indirect interest in cases and high-ranking officials to ask about the case process, ask for details, and meet investigators and prosecutors. Investigators, prosecutors, and judges take pride in their efforts to be independent and decide cases legally and fairly, but these current practices clearly pose risks that might impact independent and impartial decision-making. Therefore, it is necessary to protect the investigators, prosecutors, and judges from external influence, provide them with opportunities for independent and impartial operations, and optimize the respective regulatory framework by implementing the following recommendations:

- Identifying cases with risk of external efforts to influence outcomes and introducing special investigation strategies for such cases including the use of investigation teams rather than assigning a single investigator.
- Streamlining and improving the process of filing and receiving undue influence reports by investigators, prosecutors, and judges.
- Ensuring that IAAC, JGC, and GPO each have a permanent functioning unit with individuals specifically tasked with working to prevent illegal influence from taking place, and protecting investigators, prosecutors, and judges.

Challenges and Lessons learnt

Unfortunately, due to the COVID-19 pandemic, some of the assessment team members were unable to travel to Mongolia to conduct in-depth discussions with key stakeholders, which may affect their understanding of the problems. The assessment team worked closely with the TA working group members from IAAC, GPO, and JGC. The Initiative understood the effectiveness of a joint working group approach and the importance of consensus decisions.

Additional resources

The main project: Anti-corruption Regime in Mongolia TA report by ADB

https://www.adb.org/sites/default/files/project-documents/52197/52197-001-tar-en.pdf

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IACA ALUMNI: 4.300+
COUNTRIES & JURISDICTIONS 168

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Collective Action principles

When setting up a Collective Action begin with the end in mind –

What means success for your CA initiative (and how can you prove it)?

IACA ALUMNI

Bringing Transparency in Recruitment Data for Equitable Corporate Environments (ongoing initiative)

Prepared and brought to you by:

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Nayyara Rahman is an experienced technology management professional and researcher passionate about bridging the industry academia gap. Recognized for innovative, practical ways of imparting management and technology insights, aided by data and cross-discipline knowledge. She is continually seeking newer ways of enabling business ethics, transparency and social justice through better technology, management science and youth mobility/engagement. She is recognized for her novel ways of rethinking conventional wisdom in management concepts and their practical application.

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About the initiative

The project, GLASTIDE is an initiative born to address corruption and data opacity challenges in Pakistan, specifically within data transparency in corporate recruitment.

Based on collected data jobseekers face many challenges like discrimination or unfair pay. These decisions are not shared nor explained to the jobseekers and therefore give corporations an unfair advantage. In extreme cases, this could lead to automatic profiling and discrimination against specific minorities, and interest groups—as corporations continue to possess their confidential data even after the jobseekers/employees leave the organization. Another area of focus and a further opportunity for corruption is the sensitive data which can be auctioned or shared with third-party stakeholders without consent.

Problem being addressed

The Glastide initiative aims to solve a broader problem of unbalanced power structures between employers, employees and jobseekers, starting with the first point of contact, i.e., the recruitment process. It highlights the role of technological tools and irresponsible data management practices in exacerbating transparency challenges.

The project takes on the task of visualising the data flow within the traditional recruitment cycle. By flagging hotspots of data abuse and forms of corporate misdemeanour (e.g., data breach, potential for nepotism, abuse of personal data, etc.) Glastide aims to create a more ethical workplace. Additionally, it establishes capacity building within Jobseekers to make more responsible data decisions regarding job applications.

The second stage highlights how data asymmetries between jobseekers and potential employers lead to a further lack of transparency in the recruitment process and how this problem gets worse with the addition of artificial intelligence (AI) recruitment tools and the recruiter bias which is being fed into machine-learning based solutions.

Objectives and strategy

The Glastide project follows a Collective Action approach, as it includes multiple stakeholders to ensure a receptive corporate culture. The main stakeholders are human resource practitioners, early-stage (0 to 3 years' experience) professionals, universities and higher education institutes and lawyer or legal channels. Corporations need to be held accountable for irresponsible uses of personal data by internal stakeholders. Currently there is no legal or managerial policy instrument in Pakistan that holds corporations accountable. With a data transparency tool fully implemented, corporations are more likely to convey psychological safety for all stakeholders, not just Upper Management.

Results

To date, Glastide has achieved process redesign and job description reviews for two small and medium enterprises (SMEs). It has also conducted interviews and shortlists for one SME, and the resume filtration rate was reduced from 84 to 10 in the same period. Discussions on redesigning compensation and reward – reflecting flexibility and individual jobseeker needs are underway. One of the pivotal priorities for Glastide has been to create a "speak up culture" with one informal and anonymous reporting channel, which will depend on adaptation of technology project management tools within HR systems to achieve transparency in external groups. So far, awareness sessions of personal data rights, engaging more than 5 cohorts (about 120 individuals) have been conducted between October 2021 and November 2022.

It is anticipated that Glastide will lead to an additional reduction in resume filtration time, about 50 to 75% or higher. It also aims to formally on-board legal experts – for capacity building and cases, and to help individuals—and early-stage professionals in particular in exercising their personal data rights, especially in "Right to information", "Right to deletion", "Right to stop automated profiling" and "Right to be forgotten".

In the mid to long term, Glastide aims to redesign compensation and reward systems for at least ten SMEs, and to publish standardized, credible and accessible salary surveys, as well as "Ethical Credit Ratings" in the Glastide App.

Challenges and lessons learnt

Access to corporate data has been a challenge, as well as enabling victims of data leakage to speak up.

The key lesson here is that building rapport with relevant stakeholders will take time and will involve a more untraditional approach. With the onset of new governance within ML (vis-a-vis AI), there is hope for much more transparency, but also an equivalent degree of risks if due diligence in value chain partner choice is compromised at any point.

Additional resources

Glastide Website: www.linkedin.com/company/80097312

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Collective Action principles

A Collective Action approach does not substitute the regulatory approach but complements and strengthens it.

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UNGCNI Anti-Corruption Collective Action (ACCA) working group

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About the initiative

The Anti-Corruption Collective Action Working Group is formed by UN Global Compact Network India (UNGCNI). At UNGCNI, they have a Centre of Excellence for Governance, Ethics and Transparency (CEGET) which is committed to the fight against corruption by promoting transparency, accountability, and business integrity across the sectors.

Corruption across the sectors is an undeniable reality and arguably the most serious ethical crisis/issue today in India. Almost everyone in the country has been a victim of some form of graft or malpractice. The UNGCNI started this project with specific focus on healthcare, Micro Small and Medium Enterprises (MSME) and Maritime industries to better understand corruption, its varied nature and its adverse effects on diverse sectors.

Problem being addressed

Initially the project was started to bring transparency & ethical practices in healthcare value chain in India for the benefit of patients, society and businesses as well as to establish and scale- up Collective Action to address corruption challenges. In addition, it was initiated for the purpose of improving Public-Private Participation (PPP) and bringing transparency in pricing, procurement and service delivery.

However, later it was decided to extend to private companies, MSME and the maritime sectors. Through this project UNGCNI has been working to address corruption and transparency issues in these sectors.

Objectives and strategy

- Fostering transparency in Healthcare, MSME and Maritime sectors as well as other potential industry through Collective Action by developing and implementing innovative anti-corruption tools in collaboration with relevant stakeholders.
- Improving transparency, responsiveness and community accountability through process mechanisms and community engagement.
- Review performance and provide guidance to relevant projects/initiatives of UN Global Compact Network, India.
- Take ownership in designing, developing, and implementing anti-corruption Collective Action projects/initiatives and ensure active engagement and participation in diverse activities, events, and innovations.

Activities and results

The following activities have been undertaken and the following results have been realised:

ACTIVITIES	RESULTS
Stakeholders and community awareness and engagement	• Knowledge sharing sessions, • Outreach programs, • Celebrating national/regional days, • Dissemination of Anti-Corruption Playbook
Advocacy for policy change and implementation	• Policy dialogue with public sector • Consultative meetings with researchers to identify challenges and solutions • Multi-stakeholders meetings on ACCA (Eco-system approach) • Webinars with corporates and meeting/round tables with policy makers
Capacity building and integration of services	Sensitization programs Workshops for students, faculty, corporates and other stakeholders
Research and publications	• Best practices compendium: Value-Based Healthcare and Transparency • White paper on price transparency and service delivery • A POC document/ framework on community accountability in healthcare and PPP mechanisms (Publication).
Strengths, Weaknesses, Opportunities and Threats (SWOT) • SWOT Matrix • SWOT Analysis	• Matrix and Analysis for both internal factors and external factors
Risk assessment	• An initial risk assessment with risks and controls identified
Anti-corruption Collective Action Initiative and Oversight	• All activities of the initiative are carried out by the anti-corruption working group. Specific roles are played by various stakeholders.

Challenges and lessons learnt

After we identified the key stakeholders, it was difficult to get all stakeholders from all industries on the same platform.

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Regional Alumni Conference Asia 2022

The Regional Alumni Conference brought together IACA alumni from East, South-East, and South Asia for the conference and reunion.

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Empowering Professionals

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